

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CLERK
U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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2016 OCT -4 P 3:55

JANNAL ALPHEAUS

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

CAMDEN CITY POLICE DEPARTMENT
CAMDEN COUNTY CORRECTIONAL FACILITY
CAMDEN COUNTY SHERIFFS DEPARTMENT
COUNTY OF CAMDEN
THE CITY OF CAMDEN

COMPLAINT

Jury Trial: ☐ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

JANNAL ALPHEAUS

2642 BAIRD BLVD, APT 3

CAMDEN

NEW JERSEY 08105

856-831-6630

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary. (SEE ATTACHED)

Defendant No. 1

Name CAMDEN COUNTY CORRECTIONAL FACILITY
 Street Address 330 FEDERAL STREET
 County, City CAMDEN, CAMDEN
 State & Zip Code NEW JERSEY 08103

Defendant No. 2

Name CAMDEN COUNTY SHERIFFS DEPARTMENT
 Street Address 520 MARKET STREET
 County, City CAMDEN, CAMDEN
 State & Zip Code NEW JERSEY 08102

Defendant No. 3

Name COUNTY OF CAMDEN
 Street Address _____
 County, City CAMDEN, CAMDEN
 State & Zip Code NEW JERSEY 08007-08107

Defendant No. 4

Name CITY OF CAMDEN
 Street Address _____
 County, City CAMDEN, CAMDEN
 State & Zip Code NEW JERSEY 08101-08105

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal Questions

☐ Diversity of Citizenship

☒ U.S. Government Plaintiff

☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____

OMS**Offender Management System****Inmate Recidivism For ALPHEAUS, JANNAI**

Today's Date: 9/23/16 14:10

Inmate Name: ALPHEAUS, JANNAI
D.O.B.: 07/04/1970
Permanent #: 0400071500
Current Booking #: 4290968

Booking History

Booking #	Booking Date	Release Date	Days In	7 Incarcerations	
4071500 0000	01/15/2001 000000000	01/15/2001 39:10-24	1	TRAFFIC CONTEMPT	D
4238516 W 2010004056040	06/15/2010 000000000	07/06/2010 2C:12-3A	22	THREATENS VIOLENCE	C
✓ 4275777 W 2013001237040	02/25/2013	03/07/2013 2C:12-3A	11	THREATENS VIOLENCE	C
✓ 4277025 W 2013001996040	03/31/2013	04/18/2013 2C:12-1A	19	SIMPLE ASSAULT	D
✓ 4282258 W 2013005561040 W 2013005561040	08/10/2013	08/29/2013 2C:13-2A 2C:12-1A	20	CRIM RESTRAINT-RISK OF SBI SIMPLE ASSAULT	B D
✓ 4290968 W 2013005034040 W 2014002513040 W 2014002514040	03/18/2014	04/08/2014 2C:12-1A 2C:29-9B 2C:33-4A	22	SIMPLE ASSAULT CONTEMPT-VIOLATE ORDER INCONVENIENT ANNOYANCE	D D D
✓ 4292430 004140501616A 004140501616A FO-04-491-14 S14-2473	04/22/2014	06/12/2014 2C:12-1B(7) 2C:12-3A 2C:45-3 2C:33-4A	52	AGG ASSAULT-BODILY INJURY THREATENS VIOLENCE VIOLATION OF PROBATION OR SUSPENDED SENTENCE INCONVENIENT ANNOYANCE	B C A D

OMS**Offender Management System****Inmate Recidivism For ALPHEAUS, JANNAI**

Today's Date: 9/23/16 14:08

Inmate Name: ALPHEAUS, JANNAI
D.O.B.: 07/04/1978
Permanent #: 1408151
Current Booking #: 4323012

Booking History

7-11-11-14

Booking #	Booking Date	Release Date	Days In	5 Incarcerations	
4295935	07/11/2014	06/30/2015	355		
004140100234i		2C:12-3A	THREATENS VIOLENCE		C
w20140080450408	004141203763i	2C:12-3B	THREAT TO KILL		
	14-05-01616-a	2C:12-3A	THREATENS VIOLENCE		
4311978	09/01/2015	09/15/2015	15		
W20150056070408		2C:12-1A	SIMPLE ASSAULT		D
		2C:33-4A	INCONVENIENT ANNOYANCE		D
4313094	10/04/2015	12/11/2015	69		
W20150063590408		2C:33-4C	ALARMING COUNDUCT		D
	004140100234i	2C:45-3	VIOLATION OF PROBATION OR SUSPENDED SENTENCE		
	004140501616a	2C:45-3	VIOLATION OF PROBATION OR SUSPENDED SENTENCE		
	004141203763i	2C:45-3	VIOLATION OF PROBATION OR SUSPENDED SENTENCE		
		2C:33-4C	ALARMING COUNDUCT		D
4322876	07/18/2016	07/21/2016	4		
w20160041770408		2C:33-4A	INCONVENIENT ANNOYANCE		D
4323012	07/22/2016	09/21/2016	62		
W20160042690408		2C:29-9B	CONTEMPT-VIOLATE ORDER		D
w20160043930408		2C:29-3B	HINDER OWN PROS		C
		2C:33-4A	INCONVENIENT ANNOYANCE		D
w20160052990408		2C:29-9B	CONTEMPT-VIOLATE ORDER		D
w20160052990408		2C:33-4A	INCONVENIENT ANNOYANCE		D

THESE OFFICERS WITH THE EXCEPTION OF JOHN SCOTT STINSMAN, 43, PENNSAUKEN, NJ, ~~08109~~ - 3940 UNION AVE 08109-3006, ARE ALL STILL FAINTFULLY EMPLOYED AT CAMDEN COUNTY CORRECTIONAL FACILITY ON 3 SOUTH ON ALTERNATING DAYS AND SHIFTS.

ATTACHMENT TO PAGE 2 (DEFENDANTS)

- I WOULD ALSO REQUEST THESE DEFENDANTS BE ADDED TO CIVIL SUIT FOR ILLEGAL SEARCH/CIVIL RIGHT VIOLATIONS OF MYSELF AND CELLMATE LONNIE LILES OFFICERS AT CAMDEN COUNTY CORRECTIONAL FACILITY FOR ILLEGAL STRIP SEARCH, ~~HOLD~~ PERFORMED ~~TO~~ DUE TO ACCUSATION OF THEFT OF FACIAL RAZORS LATER RECOVERED HAVING PREVIOUSLY BEEN COLLECTED BY, AN OFFICER PRIOR TO ACCUSATIONS THIS SEARCH WAS HELD ON CELL BLOCK 3 ^{NORTH} ~~SOUTH~~ B (4-5-15)
- OFFICER SERGEANT JOHN SCOTT STINSMAN
 - HE ORDERED THE ILLEGAL SEARCH PERFORMED AFTER THE FALSE ALLEGATIONS WERE MADE, OFC STINSMAN MADE NO REPORT AND AS OF JAN. 2016 ARREST FOR ABUSING AN INMATE
 - OFFICER (FIRST UNKNOWN) RENTAS - THE OFFICER WHO MADE THE FALSE ALLEGATION AFTER HE HAD ALREADY COLLECTED THE RAZORS FROM CELL, HE INITIATED THE ILLEGAL SEARCH AFTER MY SELF AND CELLMATE PROTESTED THE ACCUSATION ON 3 NORTH B, APRIL 5, 2016
 - OFFICERS RIVIERA, (FIRST UNKNOWN) AND CORDERRO (FIRST UNKNOWN) PERFORMED ILLEGAL SEARCHES WHERE MY CELL MATE AND MYSELF WERE STRIPPED NAKED ON CELL BLOCK 3 ^{NORTH} ~~SOUTH~~ B ON APRIL 5, 2015 AFTER NUMEROUS REFUTES BY MYSELF AND CELLMATE LONNIE LILES OF THE ACCUSATION, AFTER ILLEGAL SEARCH OUR CELL WAS SHAKEN DOWN, WE LATER FOUND OUT THROUGH GRIVANCES WRITTEN THE RAZOR WAS RECOVERED IN C/O RENTAS' POSSESSION

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? CAMDEN COUNTY
CORRECTIONAL FACILITY

B. What date and approximate time did the events giving rise to your claim(s) occur? FROM
2001 - 2016 (SEE ATTACHED INMATE RECIDIVISM
FORM)

C. Facts: WHILE INCARCERATED IN CAMDEN COUNTY CORRECTIONAL

What
happened
to you?

FACILITY. I WAS SUBJECTED TO SEVERAL UNCLE HOUSING CONDITIONS
DURING EACH INDIVIDUAL STAY FROM 2001 - 2016. I WAS PLACED IN A
2 MAN CELL WITH MOST EACH TIME WITH 3-4 INMATES WHERE I WAS
MADE TO SLEEP ON THE FLOOR. AT TIMES UNDER TABLES, BUNKS, AND NEAR
TOILETS. AND IN PARTICULAR AN ILLEGAL STRIP SEARCH ON APRIL
5TH 2015. ALSO WAS DENIED WATER AND A FUNCTIONING TOILET FOR
TWO WEEKS IN A 3 INMATE CELL, WHILE BEING HOUSED IN 7 DAY
LOCKDOWN FOR 15 DAYS, AND AGAIN WAS HOUSED IN 3 SOUTH C
WITH 3 INMATES IN WITH NON-FUNCTIONING TOILET AND FOR 2
MORE WEEKS AND IGNORED AND DENIED HELP FROM MAINTENANCE,
CORRECTION OFFICERS AND SERGEANTS. I WAS ALSO HELD DAYS
AFTER I WAS TO BE RELEASED ON TWO OCCASIONS, ON SEPT 6, 2016
AND AGAIN ON SEPT 20, 2016 WITH NO EXPLANATION.

Who did
what?

Was
anyone
else
involved?

Who else
saw what
happened?

SEVERAL CORRECTIONAL OFFICERS, IT IS COMMON PROCEDURE TO
HOUSE 3-4 INMATES IN A CELL FOR MONTHS AT A TIME, REGARDLESS
OF INMATES, DISASE, MENTAL ILLNESS, SEXUAL PREFERENCE OR CONDITIONS
OF CELL.

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

CHRONIC BACK AND NECK PAIN, I WAS GIVEN PAIN MEDICATION MANY OF MY STAYS AT FACILITY. I WAS ALSO GIVEN SUBSTANDARD GENERIC, LOW QUALITY INSULIN WHICH CAUSED MY BLOOD SUGAR TO DROP DRASTICALLY WHEN I RECEIVED IT. I AM A TYPE 1 DIABETIC, FOR FOUR YEARS NOW. ALSO SUSTAINED FACIAL INJURIES AFTER BEING ASSAULTED BY AN INMATE, UNPROVOKED IN JUNE 2, 2015, AS SEVERAL OFFICERS ON POST, WERE UNATTENTIVE AND NOT AVAILABLE DURING BREAKFAST HOURS, THIS ATTACK WAS CAUGHT ON CAMERA.

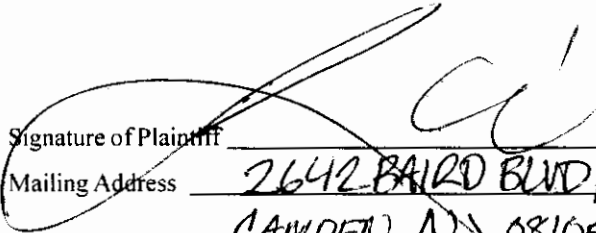
V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

1 MILLION TO 5 MILLION DOLLARS / THE FULL AMOUNT AVAILABLE
I AM TYPE 1 DIABETIC AND AM REQUESTING COMPENSATION FOR IMPROPER MEDICAL TREATMENT, AS WELL AS UNSANITARY AND UNHEALTHY LIVING CONDITIONS, AND BEING THE SUBJECT OF AN ILLEGAL STRIP SEARCH. I FEEL AS THOUGH MY HEALTH AND SAFETY WAS PLACED IN DANGER MANY TIMES.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 4th day of OCTOBER, 20 16.

Signature of Plaintiff 

Mailing Address

2642 BAIRD BLVD, APT 3
CAMDEN, NJ 08105

Telephone Number

856-831-6630

Fax Number (if you have one)

E-mail Address

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: 